

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
	)	
Carrier Current Systems, Including Broadband	)	ET Docket No. 03-104
over Power Line Systems	)	
	)	
	)	
Amendment of Part 15 Regarding New	)	
Requirements and Measurement Guidelines for	)	ET Docket No. 04-37
Access Broadband Over Power Line Systems	)	
_____	)	

**To: The Commission**

**REPLY COMMENTS OF CENTRAL STATION ALARM ASSOCIATION**

The Central Station Alarm Association, and the related Alarm Industry Communications Committee (collectively "CSAA"), hereby submit the following reply comments in the above captioned proceeding, regarding issues relating to the operation of Broadband over Power Line (BPL) systems.

After a review of the initial comments to the NPRM, it is apparent that a diverse group of commenters share CSAA's concerns about the potential for BPL systems to interfere with important public safety and safety-related communications. In this regard, commenters have expressed their concerns about interference to safety related operations,<sup>1</sup> critical services,<sup>2</sup> radio systems used by the first responder community,<sup>3</sup> safety call boxes,<sup>4</sup> inter-service emergency operations,<sup>5</sup> and "vital communications systems."<sup>6</sup> Central station alarm operations fit well among

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<sup>1</sup> Comments of American Petroleum Institute at pp. 7-8.

<sup>2</sup> Comments of IEEE-USA at p. 4.

<sup>3</sup> Comments of Missouri State Highway Patrol at p. 3.

<sup>4</sup> Comments of International Municipal Signal Association at p. 3.

<sup>5</sup> Comments of Ronald K. Wray at p. 15.

<sup>6</sup> Comments of Disaster Emergency Response Association, Inc. at p. 1.

this group, since these services are used to protect a wide range of sensitive facilities from fire, burglaries, sabotage and other emergencies, including government offices, power plants, hospitals, dam and water authorities, pharmaceutical plants, chemical plants, banks, schools/universities, and other critical facilities that could become the target of terrorist attacks as well as other life threatening events. Because of the potential consequences of an interference-related system failure involving any of these radio services or in any of these settings, CSAA urges the Commission to proceed with an appropriate degree of care and to conduct further field testing in conjunction with the National Telecommunications and Information Administration (“NTIA”) before amending its Part 15 rules to authorize BPL systems.

CSAA believes that the Commission should follow NTIA’s recommendations concerning interference prevention and mitigation techniques. CSAA and its members wish to see the development of BPL technology go forward since BPL systems may afford alarm companies a valuable new tool in providing effective central station monitoring services to the public. In this regard, CSAA agrees with the public utilities participating in this proceeding that regulatory certainty is needed, so that utilities can safely invest in this technology. However, any rules that are adopted in this proceeding should be consistent with the following recommendations of NTIA, since this governmental entity has expended considerable resources to study BPL:<sup>7</sup>

- **Minimize Power Levels** - since this would be the single most effective method for avoiding interference;
- **Avoid Locally Used Frequencies** – especially those frequencies that are currently authorized for low-power services such as alarm monitoring. Shifting or notching BPL

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<sup>7</sup> See NTIA Technical Report 04-413, *Potential Interference from Broadband over Power Line (BPL) systems to Federal Government Radio Communications at 1.7 – 80 MHz –Phase I*, U.S. Department of Commerce, (April 2004) at Section 9.3.3.

signal frequencies to avoid interference to local radio receivers may be an effective interference protection or mitigation technique.

- **Require Use of Filters and Signal Terminations** – since the use of filters on the power lines that would absorb, rather than reflect, RF signals could reduce unnecessary RF emissions.
- **Adopt a “One-Active-Device-per-Area” Rule** - since this would reduce or eliminate the potential for local, found level aggregate BPL interference.
- **Require Systems to have a Single Control Point** – since this would facilitate rapid resolution of actual cases of interference without the need for third-party intervention.
- **Require BPL Equipment Registration** – since providing this information in a centralized public database will allow local radio licensees with the information they need to alert the BPL operator of potential interference problems. However, CSAA agrees with the concerns expressed by public utilities that information about the power grid should not be made publicly available if it would in any way jeopardize homeland security. Therefore, any database should provide only enough information to enable affected licensees to contact the likely source of BPL interference, in the event of a problem. More detailed information should only be required if necessary, and in a manner that protects security.

## **CONCLUSION**

Based on the foregoing, CSAA continues to urge that the FCC take steps to enable the development and deployment of BPL systems, using appropriate caution to ensure that interference will not occur.

Respectfully submitted,

**CENTRAL STATION ALARM ASSOCIATION**

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